



STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
OPEN DUMP INSPECTION REPORT

County DuPage

Site Code 0430300024

Location/Name Downers Grove / Bison Gear

Date 4-19-91

Time: From 11:15 AM To 12:00 PM Region DuPage

Photos Taken: Yes (8) No () RP's phone # 708-968-6400

Inspector(s) Keith Trychta Weather Cloudy 45°

Samples Taken: Yes (#) No (X) Type

Interviewed David Cohn Previous Inspection None

Previous Correspondent None

SITE OBSERVATION

- Causing or allowing litter (Section 21(q)(1) of the Act) 1. X
- Causing or allowing scavenging operations (Section 21(q)(2) of the Act) 2.
- Causing or allowing open burning (Section 21(q)(3) of the Act) 3.
- Causing or allowing the deposition of waste in standing or flowing waters (Section 21(q)(4) of the Act) 4.
- Causing or allowing proliferation of disease vectors (Section 21(q)(5) of the Act) 5.
- Causing or allowing the generation of standing or flowing liquid discharge from the open dump site (Section 21(q)(6) of the Act) 6. X
- Causing or allowing the operation of an open dump so as to cause or threaten or allow the emissions of contaminants so as to cause or tend to cause air pollution in Illinois (Section 9(a) and 9(c) of the Act) 7.
- Causing or allowing the operation of an open dump so as to cause or threaten or allow the discharge of any contaminants so as to cause water pollution in Illinois (Section 12(a) and 12(d) of the Act) 8. X
- Acceptance of special waste for disposal, storage or treatment from a waste hauler that does not have a valid waste hauling permit (Section 809.302(a) of the Regulations) 9.

RECEIVED

26 APR 1991

IEPA/DLPC

EPA Region 5 Records Ctr.



265421

B1 00448

Acceptance of special waste for disposal, storage or treatment from a waste hauler that did not present a signed manifest which designated the receiver's facility as a destination for the special waste (Section 809,302(a) of the regulations) 10.

Causing or allowing the development and/or operation of a solid waste management site without a permit issued by the Agency (Sections 807,201 and 807,202 of the Regulations) 11.

Causing or allowing the open dumping of any waste (Section 21(a) of the Act) ... 12.

Conducting any waste-storage, waste-treatment, or waste-disposal operation without a permit granted by the Agency (Section 21(d) of the Act) 13.

Apparent violation of: PCB () ; Circuit Court ()
Case Number _____, Order entered on _____. 19 14.

Other 15.

INFORMATIONAL NOTES

1. Reference to "Act" herein refer to the Illinois Environmental Protection Act: Ill. Rev. Stat. ch. 111 1/2, par. 1001, et seq.
2. Reference to "Regulations" herein refer to the rules and regulations of the Illinois Pollution Control Board: 35 Ill. Adm. Code, Subtitle G.
3. Statutory and regulatory references herein are provided for convenience only and should not be construed as legal conclusions of the Agency or as limiting the Agency's statutory or regulatory powers.
4. Subject to enforcement either by administrative citation under Section 31.1 of the Act or by complaint under Section 31 of the Act.

Karen Taylor
Signature of IEPA Inspector(s)
On Page County

(SIC)

PHP:jab/3208j/22-23

200818700 pg.

B1 00449



STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY

NARRATIVE INSPECTION REPORT DOCUMENT

Date of Inspection: 4-19-91 Inspector: Keith Trychta

Site Code: Q 4 3 Q 3 Q 0 0 2 4 County: DuPage

Site Name: Downers Grove / Bison Gear Time: 11:15 am to 12:00 pm

GENERAL REMARKS

Weather conditions: Cloudy 45°, weather conditions were not affecting observed conditions.

I arrived at the Bison Gear & Engineering Corp. property (2424 Wisconsin Ave., Downers Grove) at 11:15 am. I proceeded to the North end of the Building to observe general conditions. A large concrete slab was observed at the North End of the Building. The concrete slab was used for storage of materials derived from the manufacturing process within the building. A row of Drums was observed at the brick (west) edge of the Concrete Pad (see Diagram). The Drums contain metal shavings from the manufacturing process. Also on the concrete pad were Two waste oil Storage Tanks (see diagram). The concrete pad contained a sump manhole which acts as a drainage and storage reservoir for spilled or leaking oil/Liquid. -NOTE: The sump manhole was observed to be filled to capacity. Additional liquid or oil would create an overflow of liquid off the concrete pad. Adjacent to the Concrete Pad to the west is a large dumpster/ container which is used to contain metal shavings. Photo's # 1 and 7 show conditions on the concrete Pad.

- OVER -

Directly to the West of the Concrete slab exists an area containing oil/fuel saturated soil. (SEE Diagram) The area is the drainage area for any oil/fuel spills/leak/overflows generated on the concrete pad and the metal shavings container. This area is distinguishable from the rest of the property. The area is blackened due to the saturated oil/fuel in the soil. No vegetative cover exists within the area of concern. Photo's # 1 to 8 show observed conditions.

Line item #1 - Causing or allowing litter. The Agency views the improper disposal or open dumping of any material as litter.

Line Item #6 - Causing or allowing the generation of standing or flowing liquid discharge from the open dump site. The Agency Recognizes the possibility & probability that open dumped material has flowed offsite.

Line Item #7 - Causing or allowing the operation of an open dump so as to cause or threaten or allow the discharge so as to cause water pollution in Illinois.

The Agency Recognizes the potential threat of water pollution due to improper waste disposal practices on site.

Line Item #12 - Causing or allowing the open dumping of any waste.

over



After observing General Conditions within the area of concern, I met with David Cohn of Bison Gear. Mr. Cohn stated that he was aware of the conditions existing on the North side of the building. He stated that he had received quotes from several environmental specialist companies for the remediation of the area of concern. I stated to Mr. Cohn that Remediation will be required along with documentation of the work. I also stated that preventive practices should be implemented (I.E. redesign of storage area for waste oils and metal shavings and employee training). I also gave Mr. Cohn some suggestions as to how to initiate cleanup activities in accordance with Agency recommendations.

I concluded the inspection at 12:00 pm.

End Narrative

GOS:BB:tk:3/2/12(9/18/86)

Doc 18 (Rev. 8/86) Pg. 7

B1 00452

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY

SITE SKETCH

Date of Inspection: 4-19-91

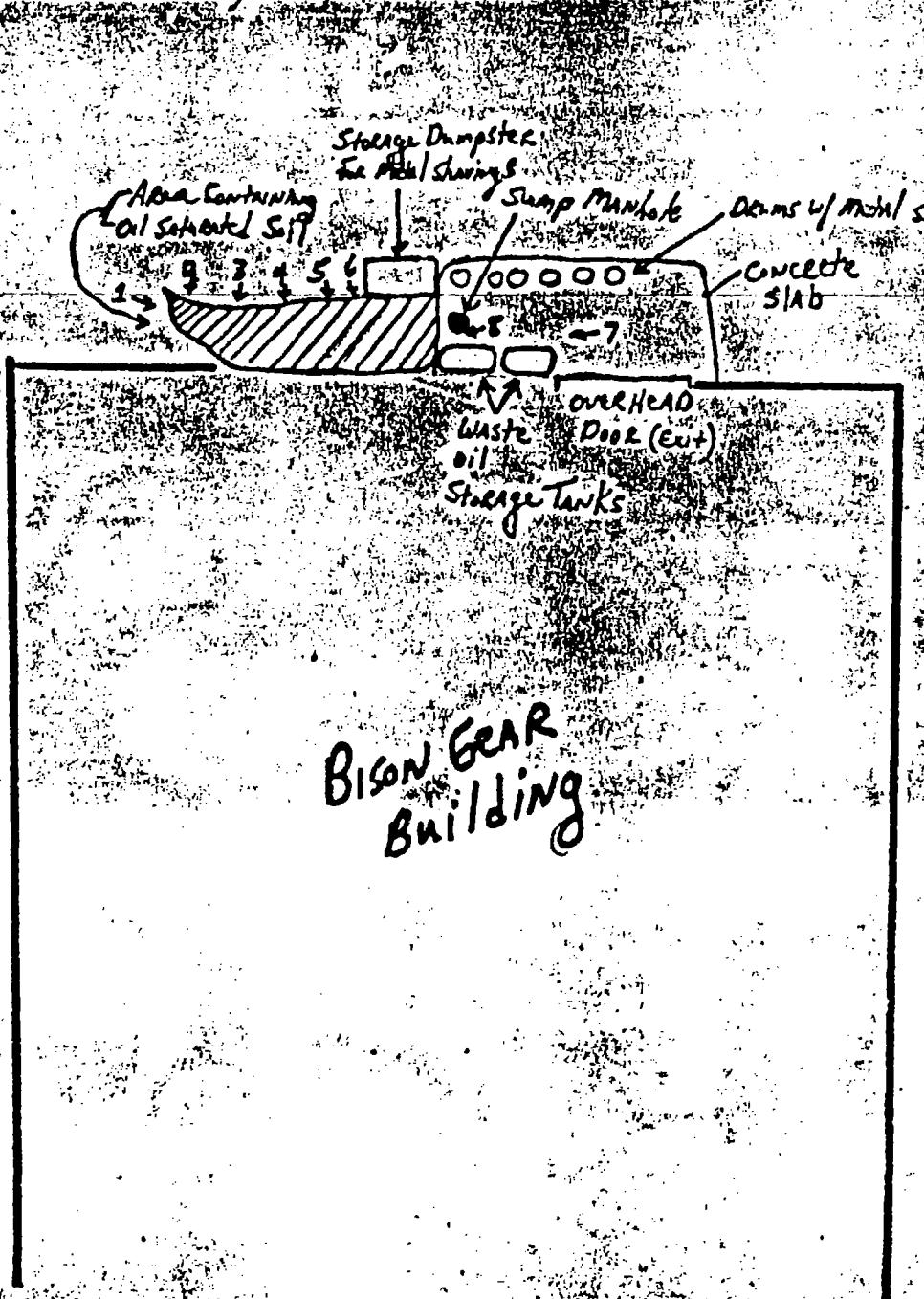
Inspector: Keith Teychta

Site Code: 0 4 3 0 3 0 0 2 4

County: DuPage

Site Name: Downers Grove / Bison Gear

Time: 11:15 to 12:00 pm



STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
OBSERVATION REPORT - I.P.A.C.F.C.O. 5.5.C
(1) (2) (3) (4) (5) (6) (7) (8) (9)

Page 1 County DICKINSON / BISON GEAR Site Code 0430300024
Time 7:15 AM Photos Taken Yes (15) No () Region 2 Date 5/29/91
To 3:30 PM Site Open Yes () No (X) Letter Sent (Yes or No) N
Samples Taken Yes () No (X) Groundwater () Surface () Other () Inspector D. Cohn
Interviewed D. Cohn (Bison Gear) 6/29/91 Weather CRAP 80°
Previous Inspection 4-19-91 Previous Correspondence 4-23-91

OPERATIONAL STATUS:

Operating ()
Temporarily Closed (X)
Closed not Covered ()
Closed and Covered ()

TYPE OF OPERATION:

Sanitary Landfill ()
Random Dump ()
Other OPEN DUMP
Quantity Received Data (1-6)

AUTHORIZATION:

E.P.A. Permit ()
Variance ()
21 (d) ()
Board Order ()
Other ()
None (5)

GENERAL REMARKS

The purpose of the observation was for an ICPA representative to witness the removal of contaminated soil from the site. Dickens Lined and Tree Chapel from the Ogle County Department of Environmental Services accepted the ICPA inspection during the site clean-up. The ICPA Inspectors were present intermittently between 7:15 AM and 3:30 PM. The inspectors observed the cleanup activities and discussed the activities with David Cohn (Bison Gear) and 6/29/91 H-NVR Metering Services Company. On 6/29/91 TSC was present to verify site conditions and measure the excavation with an H-NVR meter. Please refer to the letter dated 7-1-91 letter from TSC to River Gear for details of the inspection (attached).

RECEIVED

20 JUN 1991

IEPA/DLPC

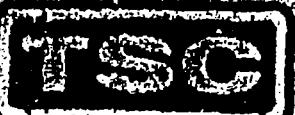


B1 00454

TECHNICAL INSPECTION REPORT DOCUMENT (cont'd) (004)

The following is a listing of photos taken by H-REP-2P-10001.
Also Please Refer to the Site Diagram.

- 41 - 7:40 am - Excavation in Progress
- 42 - 7:42 am - Excavation in Progress
- 43 - 7:42 am - Special Waste Hauling Vehicle
- 44 - 7:47 am - Loading of waste
- 45 - 7:49 pm - Excavation in Progress
- 46 - 7:52 am - Excavation in Progress
- 47 - 9:19 am - H-Nu (TSC Rep.)
- 48 - 9:19 am - Material Under Concrete Pad
- 49 - 9:31 am - Material Under Concrete Pad
- 50 - 9:36 am - Excavation near Pad
- 51 - 10:26 am - Excavation in Progress
- 52 - 3:23 pm - Excavation Under Concrete Pad
- 53 - 3:03 pm - H-Nu at Material Under Concrete Pad
- 54 - 3:15 pm - Excavation Complete
- 55 - 3:15 pm - Excavation Complete



TESTING SERVICE CORPORATION

Carol Stream, IL

June 27, 1991

Mr. Dave Cohn
BISON GEAR
2424 Wisconsin Avenue
Downers Grove, Illinois 60515

Construction Materials Engineering & Testing
Environmental Engineering
Geotechnical & Hydrogeological Studies
Monitoring Work

RE: L-29,970
OIL SPILL REMEDIATION
Bison Gear Facility
Downers Grove, Illinois

Dear Mr. Cohn:

This report presents the results of environmental services recently performed by Testing Service Corporation (TSC) in connection with the above referenced facility. Soil boring and analytical sampling work was performed on April 23, 1991 has been previously reported in our letter dated May 8, 1991. This report documents work performed in the interim since that date.

During the remediation of this site, the role of Testing Service Corporation has been to visually observe the removal of contaminated soil, monitor the excavation with a photoionization meter and collect soil samples which were submitted by the client for laboratory analysis. These observations have been documented during two site visits and are reported below.

On May 29, 1991 an Environmental Geologist from Testing Service Corporation (TSC) visited the site. On that date, visibly stained soil was excavated from the effected area with a model 1955 Cat track vehicle and a small front-loader rubber-tired tractor (Bobcat). The material was loaded on dump-type tractor trailers licensed for Special Waste transportation. Century Contractors served as the excavators and H & R Wrecking was employed to transport the contaminated soil.

Excavation of soil began in the western portion of the site near Boring B-2 as outlined on the enclosed Boring Location Plan. The excavation proceeded eastward and extended to the edge of a concrete pad used for the storage of chemicals and metal cultings. The excavated soil indicated readings of 100-300 ppm deflection on the HNU. Visually stained and odorous soil was removed to a depth of 1 to 4 feet in an area approximately 25 x 50 feet square. Following soil removal, HNU readings were taken to verify that sufficient material had been removed. HNU readings of the walls and base of the excavation over to the pad ranged from 3-5 ppm.

After removing the majority of the contaminated material, excavation of the pit wall adjacent to the concrete pad revealed contamination around a sump located below the pad. The pad was undercut and contaminated soil was removed from beneath the concrete pad using the Bobcat bucket to the maximum extent of the equipment. Additional visibly stained soil was then removed from around the sump manually using

Bison Gear
L-29, 970A - June 6, 1991

a shovel. Initial HNu meter readings indicated contaminated soil beneath the concrete slab at 175 ppm. The exposed wall face was left open to vent the volatile elements to the atmosphere. This volatilization process was aided by the use of a fan blowing air across the exposed face. Volatile Organic concentrations dropped to 20-75 ppm within an hour after exposure to air.

It was suggested by the TSC Environmental Geologist that the face of the excavation be allowed to remain exposed for a period of time to facilitate additional volatilization. The representative of the Illinois Environmental Protection Agency concurred with this recommendation and the excavation was left open.

The excavation was again inspected by an Environmental Geologist from our office using an HNu meter on May 31, 1991. On that date, HNu readings of the material beneath the concrete pad had decreased to levels ranging from 5-20 ppm with the majority of areas indicating concentrations of 8-10 ppm. The excavation was left open to allow further volatilization of organic compounds.

Thank you for the opportunity to have assisted you with this project. Please call if there are any questions or if we may be of further service.

Respectfully submitted,

TESTING SERVICE CORPORATION

Prepared by,



Bruce Poynor, Senior Engineering Geologist
Vice President

Brian Walker
Environmental Geologist

Enclosures: Boring Location Plan



STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
OPEN DUMP INSPECTION REPORT

County DuPage Site Code Q 4 3 Q 3 Q 0 0 2 4

Location/Name Owners Grove / Bison Gear Date 6-13-91

Time: From 7:30 A To 8:00 A Region Pinewood

Photos Taken: Yes (4) No () RP's phone # 968-6400

Inspector(s) Keith Treytka Weather 70°s CLEAR

Samples Taken: Yes () No (X) Type

Interviewed David Cohn Previous Inspection 5-29-91

Previous Correspondent 5-29-91

SITE OBSERVATION

- Causing or allowing litter (Section 21(q)(1) of the Act) 1*
- Causing or allowing scavenging operations (Section 21(q)(2) of the Act) 2*
- Causing or allowing open burning (Section 21(q)(3) of the Act) 3*
- Causing or allowing the deposition of waste in standing or flowing waters (Section 21(q)(4) of the Act) 4*
- Causing or allowing proliferation of disease vectors (Section 21(q)(5) of the Act) 5*
- Causing or allowing the generation of standing or flowing liquid discharge from the open dump site (Section 21(q)(6) of the Act) 6*
- Causing or allowing the operation of an open dump so as to cause or threaten or allow the emissions of contaminants so as to cause or tend to cause air pollution in Illinois (Section 9(a) and 9(c) of the Act) 7.
- Causing or allowing the operation of an open dump so as to cause or threaten or allow the discharge of any contaminants so as to cause water pollution in Illinois (Section 12(a) and 12(d) of the Act) 8.
- Acceptance of special waste for disposal, storage or treatment from a waste hauler that does not have a valid waste hauling permit (Section B09.302(a) of the Regulations) 9.

RECEIVED

20 JUN 1991

IEPA/DLPC

Acceptance of special waste for disposal, storage or treatment from a waste hauler that did not present a signed manifest which designated the receiver's facility as a destination for the special waste (Section 809.30(a) of the regulations) 10. _____

Causing or allowing the development and/or operation of a solid waste management site without a permit issued by the Agency (Sections 807.201 and 807.202 of the Regulations) 11. _____

Causing or allowing the open dumping of any waste (Section 21(a) of the Act) ... 12. _____

Conducting any waste-storage, waste-treatment, or waste-disposal operation without a permit granted by the Agency (Section 21(d) of the Act) 13. _____

Apparent violation of: PCB (); Circuit Court ()
Case Number _____, Order entered on _____ . 19 14. _____

Other 15. _____

INFORMATIONAL NOTES

1. Reference to "Act" herein refer to the Illinois Environmental Protection Act: Ill. Rev. Stat. ch. 111 1/2, par. 1001, et seq.
2. Reference to "Regulations" herein refer to the rules and regulations of the Illinois Pollution Control Board: 35 Ill. Adm. Code, Subtitle G.
3. Statutory and regulatory references herein are provided for convenience only and should not be construed as legal conclusions of the Agency or as limiting the Agency's statutory or regulatory powers.
4. Subject to enforcement either by administrative citation under Section 31.1 of the Act or by complaint under Section 31 of the Act.


Signature of IEPA Inspector(s)
DuPage County

PMP:jab/3208J/22-23

IL 537-1775
LPC 300 10/08 pg. 2

B100459

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY

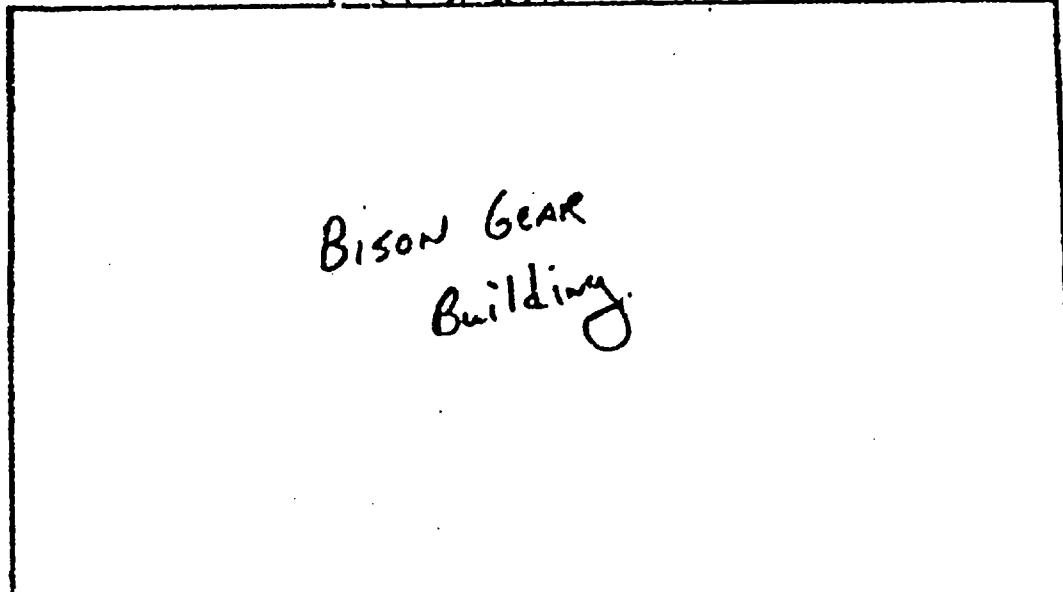
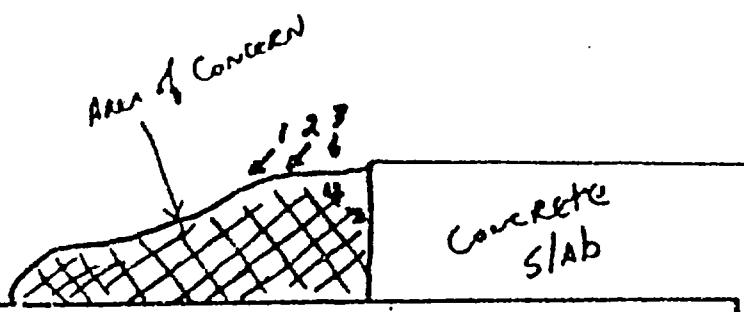
SITE SKETCH

Date of Inspection: 6-13-91 Inspector: Keith Trychta

Site Code: Q430300024 County: DuPage

Site Name: Downers Grove / Bison Gear Time: 7:30 to 8:00 AM

4 N





STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY

NARRATIVE INSPECTION REPORT DOCUMENT

Date of Inspection: 6-13-91 Inspector: Keith Tychta
Site Code: 043030024 County: DuPage
Site Name: Downers Grove/Bison Gear Time: 7:30 to 8:00 AM

GENERAL REMARKS

The purpose of this site visit was to perform a re-inspection of the subject site, to determine it's compliance status after remediation.

- The temperature was in the 70°'s under clear skies.

Weather conditions were not affecting site remediation.

- David Cohn (Bison Gear) was present during the inspection.

I arrived at the Bison Gear site at 7:30 am. I walked to the North side of the site to observe general conditions within the area of concern (see diagram). Areas containing contaminated soil had been removed and replaced with clean fill. Photo's #1 & #3 show observed conditions. The last 3 feet of area along the concrete pad had not been filled as instructed by the department. TSC had "re-tested" the area on 5-31-91 with an "H-NV" meter and found the area to be free of measurable quantities of volatile organics. I did not observe the presence of contaminated material, visually or by odore. I stated to David Cohn that this remaining area could be filled. Photo #4 shows the remaining excavated area. During the inspection I did not observe the presence of contaminated soils or uncontained liquids. I concluded the inspection and left the site at 8:00 am.

The Bison Gear site was observed to be in compliance.

No apparent violations were observed.

ADMINISTRATIVE WARNING NOTICE
 BROUGHT BY THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

IN THE MATTER OF:

Bison Gear & Engineering Corp. 0430300024 - DuPage
2424 Wisconsin Avenue Downers Grove/Bison Gear
Downers Grove, IL 60515

WARNING: ATTENTION REQUIRED

YOU MAY BE SUBJECT TO A PENALTY OF \$1000
IF YOU FAIL TO COMPLY WITH THE TERMS OF THIS
ADMINISTRATIVE WARNING NOTICE

FACTS

On April 19, 1991, an inspection of the Bison Gear property (2424 Wisconsin Avenue, Downers Grove) which you have caused or allowed to be used as an open dump was conducted by Feith Trychtia representing the DuPage County Department of Environmental Concerns and the Illinois Environmental Protection Agency (hereinafter "IEPA"). This inspection was conducted in accordance with Sections 4 (c) and 4 (d) of the Illinois Environmental Protection Act; Ill. Rev. Stat. 1987, ch. 111 1/2, pars. 1004 (c) and (d). The purpose of this inspection was to determine your compliance with the Illinois Environmental Protection Act and the Ill. Adm. Code, Subtitle G, Part 807; Solid Waste and Part 809; Special Waste Hauling Regulations of the Illinois Pollution Control Board.

The attached inspection report specifies the date, time and location of the inspection, along with other relevant information. Items numbered One (1) through Fourteen (14) represent requirements established by the Illinois Environmental Protection Act and/or the Ill. Adm. Code, Subtitle G, Parts 807 and 809. At the time of the inspection, apparent violations were identified. The specific apparent violation(s) are identified with an "X" on the attached inspection report.

REQUIRED RESPONSE

You must submit, in writing, within fifteen days of the date of this letter, the reasons for the apparent violations noted on the attached inspection report. Also, describe in detail the corrective action which has been or will be taken to correct the apparent violation(s) noted in the inspection report. PLEASE REFERENCE THE IEPA DESIGNATED FACILITY NUMBER AND FACILITY NAME ASSIGNED ABOVE ON ANY CORRESPONDENCE CONCERNING THIS MATTER.

RECEIVED

IEPA/DLPC

B100462

CORRECTIVE ACTION REQUIRED

IF YOU WISH TO AVOID FURTHER ADMINISTRATIVE OR LEGAL ENFORCEMENT, YOU MUST INITIATE THE FOLLOWING CORRECTIVE ACTIONS:

1. Immediately cease all open dumping of waste oils/fuels on the subject site.
2. Remove all waste to an IEPA permitted landfill. For any waste that you remove from the site to a permitted landfill, you must save receipts from that landfill and submit copies to the IEPA.
3. Submit documentation to the IEPA through a certified environmental engineering company, that all contaminated material was properly identified and removed.

You are given 60 days from April 24, 1991 to complete the corrective action. The deadline is June 24, 1991. A re-inspection by Agency personnel will be conducted to verify compliance.

POTENTIAL SANCTIONS

We advised that if the attached inspection report alleges violations subject to the administrative citation process, pursuant to Ill. Rev. Stat. 1987, ch. 111 1/2, par. 1931.1, this Agency may, WITHOUT FURTHER NOTICE, cause an administrative citation to be filed with the Pollution Control Board if the requirements specified in this Administrative Warning Notice are not satisfied. Please be advised that each and every finding of an administrative citation violation requires a mandatory fine of \$500.00 per violation. Notwithstanding the fact that an administrative citation may be filed, you are expected to respond to this letter in order to describe the steps you have or will take to correct all of the violations noted in the inspection report and to outline a proposal for action to insure that the alleged violations will not reoccur.

You are hereby further advised that noncompliance with the requirements of the Illinois Environmental Protection Act and rules and regulations adopted thereunder may result in the following:

1. The filing of an enforcement action with the Pollution Control Board pursuant to Ill. Rev. Stat. 1987, ch. 111 1/2, par. 1931.1 et seq., and in particular, Ill. Rev. Stat. 1987, ch. 111 1/2, par. 1931.1; or
2. The filing of a civil action in circuit court pursuant to Ill. Rev. Stat. 1987, ch. 111 1/2, par. 1942.

Potential sanctions for the legal actions described above include, but are not limited to: Assessment of civil penalties in accordance with Ill. Rev. Stat. 1987, ch. 111 1/2, par. 1042, which provides for a maximum civil penalty not to exceed \$10,000.00 for said violation, and an additional civil penalty not to exceed \$1,000.00 for each day during which violation continues, an order to cease and desist from further violations, remedial action, the posting of a security instrument to assure correction of an adjudicated violation, and restraining and injunctive orders.

GENERAL INFORMATION

Your written response and one copy of all documents submitted in response to this letter should be sent to:

6
—
CC
—
C
—
By: Steven K. Dunn
Solid Waste Administrator
DuPage County Department of
Environmental Concerns
421 N. County Farm Road
Wheaton, IL 60187

Should you have any questions concerning this Administrative Warning Notice or need further assistance, contact Keith Trychtal at 682-7110.

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

By: *Steven K. Dunn*
Steven K. Dunn
Solid Waste Administrator

Date: *April 8, 1991*

CERTIFIED MAIL #P 462 728 549

SEDE: jrw

cc: Todd Mayville/Springfield
Laura Tavares/Maywood
Gretta Tameling/SAI
FILE